

Laura Vartain Horn (SBN: 258485)  
**KIRKLAND & ELLIS LLP**  
555 California Street, 30th Floor  
San Francisco, CA 94104  
Telephone: (415) 439-1625  
[laura.vartain@kirkland.com](mailto:laura.vartain@kirkland.com)

Allison M. Brown (Admitted *Pro Hac Vice*)  
**KIRKLAND & ELLIS LLP**  
2005 Market Street, Suite 1000  
Philadelphia, PA 19103  
Telephone: (215) 268-5000  
alli.brown@kirkland.com

Jessica Davidson (Admitted *Pro Hac Vice*)  
**KIRKLAND & ELLIS LLP**  
601 Lexington Avenue  
New York, NY 10022  
Telephone: (212) 446-4723  
[jessica.davidson@kirkland.com](mailto:jessica.davidson@kirkland.com)

Kim Bueno (Admitted *Pro Hac Vice*)  
**KIRKLAND & ELLIS LLP**  
401 W. 4<sup>th</sup> Street, Austin, TX 78701  
Telephone: (512) 355-4390  
kim.bueno@kirkland.com

*Counsel for Defendants*  
UBER TECHNOLOGIES, INC.,  
RASIER, LLC, and RASIER-CA, LLC

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION.

Case No. 3:23-md-03084-CRB

### This Document Relates to:

*Jaylynn Dean v. Uber Technologies, Inc., et al., No. 3:23-cv-06708*

**DEFENDANTS' ADMINISTRATIVE  
MOTION TO CONSIDER WHETHER  
ANOTHER PARTY'S MATERIAL  
SHOULD BE FILED UNDER SEAL**

Judge: Hon. Charles R. Breyer  
Courtroom: 6 – 17th Floor

DEFENDANTS' ADMINISTRATIVE MOTION TO CONSIDER WHETHER ANOTHER PARTY'S  
MATERIALS SHOULD BE SEALED  
CASE NO. 3:23-MD-03084-CRB

1                   **TO THE COURT, THE PARTIES, AND ALL COUNSEL OF RECORD:**

2                   Under Civil Local Rules 7-11 and 79-5(f), Defendants hereby move the Court to consider  
 3 whether another party's material should be filed under seal in connection with their Opposition to  
 4 Plaintiff's Omnibus Motions in Limine. In addition to filing Plaintiff's materials provisionally  
 5 under seal in connection with this Administrative Motion, Uber is also provisionally filing its own  
 6 materials under seal, and will address the sealing of those materials in a filing on January 6, 2026,  
 7 as provided in the Court's December 19, 2025 Stipulation and Order to Permit Provisionally Filing  
 8 Under Seal. ECF 4739.

9                   **Material To Be Filed Under Seal**

10                  The following materials contain information and documents designated by Plaintiff as  
 11 confidential.

12 <b>Document</b>	13 <b>Description</b>	14 <b>Designating Party</b>
15                  Defendants' Opposition to Plaintiff's 16                  Omnibus Motions in Limine	17                  Excerpt concerning 18                  the police report 19                  involving the incident 20                  at p. 1  21                  Excerpts containing 22                  the mental health 23                  history of Jaylynn 24                  Dean at pp. 2-3  25                  Excerpts regarding the 26                  intimate aspects of 27                  Jaylynn Dean's 28                  personal life at pp. 3-6  29                  Excerpts regarding 30                  familial disputes and 31                  past substance abuse 32                  by a third party at pp. 33                  6-8	34                  Plaintiff
35                  Ex. 2 to Defendants' Opposition to 36                  Plaintiff's Omnibus Motions in Limine	37                  BW- 38                  Dean_Jaylynn_000024	39                  Plaintiff

Document	Description	Designating Party
Ex. 3 to Defendants' Opposition to Plaintiff's Omnibus Motions in Limine	June 27, 2025 Deposition of Jaylynn Dean (excerpted)	Plaintiff
Ex. 4 to Defendants' Opposition to Plaintiff's Omnibus Motions in Limine	November 11, 2025 Deposition of Mindy Mechanic (excerpted)	Plaintiff
Ex. 5 to Defendants' Opposition to Plaintiff's Omnibus Motions in Limine	June 25, 2025 Deposition of Natasha Ramos (excerpted)	Plaintiff
Ex. 6 to Defendants' Opposition to Plaintiff's Omnibus Motions in Limine	June 26, 2026 Deposition of Olajuwon Ramos (excerpted)	Plaintiff
Ex. 7 to Defendants' Opposition to Plaintiff's Omnibus Motions in Limine	Exhibit 3 to the June 25, 2025 Deposition of Natasha Ramos	Plaintiff
Ex. 8 to Defendants' Opposition to Plaintiff's Omnibus Motions in Limine	November 23, 2025 Deposition of Mindy Mechanic (excerpted)	Plaintiff

1 DATED: December 30, 2025

Respectfully submitted,

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3 */s/ Laura Vartain Horn*

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Laura Vartain Horn (SBN 258485)  
**KIRKLAND & ELLIS LLP**  
555 California Street, Suite 2700  
San Francisco, CA 94104  
Telephone: (415) 439-1625  
laura.vartain@kirkland.com

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Allison M. Brown (Admitted *Pro Hac Vice*)  
**KIRKLAND & ELLIS LLP**  
2005 Market Street, Suite 1000  
Philadelphia, PA 19103  
Telephone: (215) 268-5000  
alli.brown@kirkland.com

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Jessica Davidson (Admitted *Pro Hac Vice*)  
**KIRKLAND & ELLIS LLP**  
601 Lexington Avenue  
New York, NY 10022  
Telephone: (212) 446-4800  
jessica.davidson@kirkland.com

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Kim Bueno (Admitted *Pro Hac Vice*)  
**KIRKLAND & ELLIS LLP**  
401 W. 4<sup>th</sup> Street, Austin, TX 78701  
Telephone: (512) 355-4390  
kim.bueno@kirkland.com

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Attorneys for Defendants  
UBER TECHNOLOGIES, INC.,  
RASIER,LLC, And RASIER-CA, LLC